



CQ579

**IDAHO FISH & GAME**

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Dirk Kempthorne/Governor  
Steven Huffaker/Director

September 23, 2002

NEPA Task Force  
P.O. Box 21150  
Salt Lake City, UT 84122

Re: CEQ Notice and Request for Comments; 67 Fed. Reg. 45510 (July 9, 2002)

Gentlemen and Ladies:

Idaho Department of Fish and Game (IDFG) personnel have reviewed the referenced notice. IDFG supports the comments prepared by the International Association of Fish and Wildlife Agencies and the Association's Federal Aid Work Group on the referenced notice. These Association's comments and those of the Work Group adequately address our concerns. We offer the following to supplement their comprehensive analysis of this topic.

A. Technology, Information Management, and Information Security

1 & 3. We use a number of sources of information including in-house databases managed by the IDFG. One of the most important sources is the Conservation Data Center databases (Natural Heritage Program Network database) which contain information on rare plant and animal species, rare habitats, and wetlands. These are both standing and project-specific databases.

5. The most significant problem we encounter in using databases, information, and documents from federal agencies for NEPA and other processes is knowing where they are. We prefer getting information from websites. There is a need to establish a website clearinghouse to locate information and documents and ideally to download the information. The Northwest Power Planning Council and the Columbia Basin Fish and Wildlife Authority websites are two excellent examples of clearinghouses of information that could serve as models. These websites provide easy access to a tremendous amount of information on the fish and wildlife resources of the Columbia River Basin and associated subbasin plans, projects, and funding.

6. As noted above, we find websites to be a very useful information management tool. Websites can also be an efficient method of gathering public input. The IDFG uses its website to gather public input on rule making and management programs. One caution, website-based public input leaves out many publics and therefore should not be the only method employed.

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CQ579

NEPA Task Force  
September 23, 2002  
Page 2

7. Information security is important. For example, IDFG is particularly concerned about information on the exact location of rare species. We provide approximate locations to the general public. Agencies and educational institutions receive greater detail but must sign an information use agreement to protect sensitive information. Most information providers have developed their own security systems for the data they disseminate. Resource management agencies should be considered separately from the public in the level of detail they are provided.

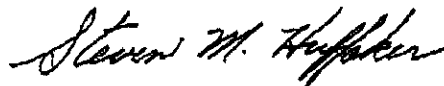
#### B. Federal and Intergovernmental Collaboration

1, 2, & 3. IDFG is a strong supporter of collaboration and collaborative processes. It is the most effective, although often not the most efficient, method of resolving resource management issues. IDFG has participated in "joint lead" processes. We have the greatest "success" in those where we provide information, technical expertise, and a fish and wildlife management perspective to federal agencies. However, we are particularly wary of those that jeopardize the retention of state authority to manage the fish and wildlife resources (ex. Bison hunting in Wyoming, see Association's letter). State agencies should be involved in NEPA processes that involve fish and wildlife but they need to be protected from being co-opted into the federal family and thereby losing their independent authority to manage fish and wildlife. One way to do this is through employee sharing, whereby a state employee is loaned to a federal agency and becomes a federal employee for the term of the work. This way the experience and information is provided to the federal agency but the state agency is not officially a cooperator and is therefore not subject to court decisions as was the case in Wyoming.

On the other end of the scale, state agencies are often treated exactly like the public in NEPA analysis. Our considerable knowledge and experience is minimized under these circumstances and the NEPA process, documents, and analysis suffer as a result. We feel there is great value in providing opportunities for state and local governments, particularly resource management agencies, to participate in the NEPA process at a level below joint lead but above the general public.

In closing, we wish to reiterate our strong support for the International Association's comments. Idaho and many other states have contributed to their development and we heartily endorse them. Thank you for the opportunity to contribute to the NEPA Task Force review.

Sincerely,



Steven M. Huffaker  
Director

SMH:TT:tlv

CQ579

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COMMENTS \_\_\_\_\_

Instructions: \_\_\_\_\_  
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